

Ex. B

From: [Gerson, Lisa](#)
To: [Tracey L. O'Reilly](#)
Cc: [MDL1358](#); mdl1358@weitzlux.com; toxictorts@toxictorts.org
Subject: PA: Site List - ID Numbers
Date: Tuesday, February 02, 2016 3:56:43 PM

Tracey,

Thank you for your letters of January 22 and February 1. To confirm, we understand that the parties are talking about the following types of numbers:

- Six-DIGIT "Primary Facility" numbers found, for example, in column D of PA-MTBE-0000004;
- Seven-DIGIT hyphenated "Facility ID" numbers found, for example, in column E of PA-MTBE-0000004 and on the cover of at least some environmental reports submitted to DEP.

However, because the letters alternatively refer to the Column D number as the "Primary Facility ID" number (Jan. 22 letter) and the "Facility ID" number (Feb. 1 letter), we refer to the numbers simply as "6-DIGIT" or "7-DIGIT."

Based on your January 22 letter, we understand that:

- Plaintiff has currently provided all 7-DIGIT numbers that is has readily available, but is continuing to search for additional 7-DIGIT numbers and is willing to update its site list with additional 7-DIGIT numbers found;
- Plaintiff is willing to undertake to locate and provide 6-DIGIT numbers for all gasoline station release sites on its list so long as Defendants are willing to do the same; and
- Plaintiff has agreed to produce its list in Excel format.

If our understanding on any of the above is incorrect, please let us know.

Assuming the above is correct, Defendants will agree to provide their lists in Excel or Word format and to update their lists to include the 6-DIGIT and 7-DIGIT numbers to the extent contained in Defendants' records. However, Defendants cannot guarantee that their records will contain either or both of these numbers for all sites.

Finally, we don't believe your letter addressed our concern that a site – i.e. same physical location – may have two different 7-DIGIT numbers. For example, Facility ID's 23-29301 and 39-21079 appear to be the same Shell station (as another example, sites 09-43266 and 09-09151). We also are concerned that some numbers simply are incorrect (e.g. 33-31336 and 46-09153 do not return any results in the Authorization Search). Therefore Defendants believe that any combined or "master" list Plaintiff puts together is likely to have duplicate sites that will require a more "manual" effort to de-dupe. Will Plaintiff agree to undertake that task?

If the above is acceptable, Defendants suggest the parties exchange their updated, electronic site lists in two weeks, by February 16, 2016. Alternatively, we can be available for a call later this week.

Thank you,

Lisa A. Gerson